

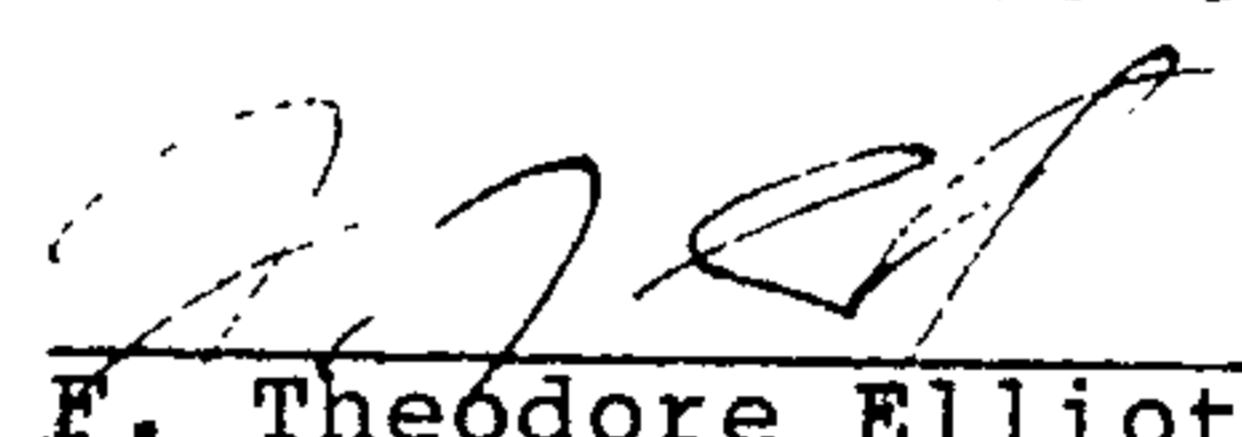
3. The Plaintiffs deem their record title to said parcel as designated on Exhibit A filed herewith to be defective for lack of demonstratable record title prior to their acquisition of said property.

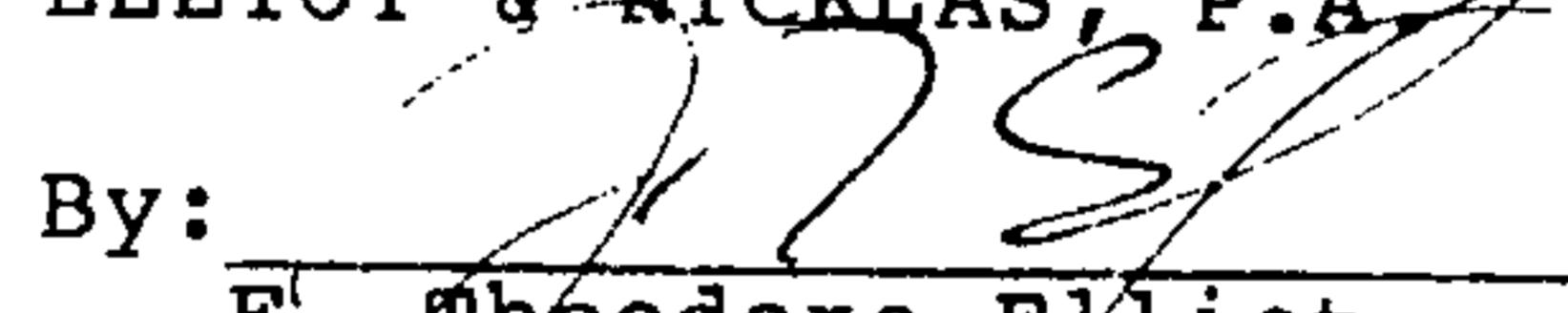
4. The Plaintiffs claim fee simple ownership of said parcel by virtue of the fact that they have been in open, notorious, hostile and actual or constructive possession of the said tract, under color of title, for a continuous and uninterrupted period of more than twenty years immediately past, and have therefore acquired fee simple ownership thereof by adverse possession.

5. More particularly, the Plaintiffs have, under color of title set forth in the deed hereinabove mentioned, regularly entered onto the land described therein, leveled portions thereof for a potential home site, camped and built campfires thereon, engaged in hiking and other recreation thereon and gathered stones and rocks from the land for their own use elsewhere.

6. There is no person or party appearing of record or in fact having or claiming to have any outstanding hostile right in or to said property although reasonable effort to locate any such party has been made in good faith by the Plaintiffs, their attorneys and agents, the examination of all pertinent land, estate and tax records of Frederick County, Maryland, for over sixty years and the interrogation of the owners of adjoining properties as practicable.

WHEREFORE, the Plaintiffs pray that this Honorable Court Decree in them good and marketable fee simple title in and to the said parcel described in Exhibit I attached hereto that the Court allow service of process by posting of notice on the land as provided in Rule 2-122, Maryland Rules, Annotated Code of Maryland; and for such other and further relief as the nature of the case may require.

  
F. Theodore Elliot  
and

  
ELLIOT & NICKLAS, P.A.

By:

  
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